

## TRO Exhibit 9: Final Declaration of Lester Lee

DECLARATION OF LESTER AUBREY LEE, JR.

IN SUPPORT OF EMERGENCY RELIEF

I, Lester Aubrey Lee, Jr., declare under penalty of perjury pursuant to 28 U.S.C. 1746 that the following statements are true and based on my personal knowledge, and are submitted in support of my Emergency Motion for Temporary Restraining Order and other relief:

1. In April 2025, there was a minor dog-related incident that was fully resolved between me and the other dog owner. No fault was assigned, and I paid the \$100 veterinary bill in full. However, on June 11, 2025, I was contacted by a representative of my landlords property management team who stated that Robert Haddad contacted them to falsely claim that I owed unpaid veterinary bills. Mr. Haddad also asserted that the other dog owner had prepared an affidavit, suggesting further coordination. This has caused significant distress and constitutes retaliation.

2. Mr. Haddad previously sent an email to my landlord threatening legal action if the lease was not rescinded. He claimed I had caused hundreds of thousands of dollars in damage to my prior unit and stated he would not approve any reasonable accommodation request. He also disclosed my medical status and sent a 'Trojan horse' lease addendum granting the condo association authority to enter and evict me without notice. This is coercive, retaliatory, and violates my rights under the Fair Housing Act and ADA.

3. A Ring doorbell camera and a peephole camera were installed without consent, capturing my movements and conversations. These were not installed by residents, but by direction or approval of the condo board. This constitutes a violation of Maryland Wiretap Act (Md. Code, Cts. & Jud. Proc. 10-402) and poses a grave threat to my safety and privacy.

4. AI-enhanced license plate reader cameras were installed without disclosure to residents. I have reason to believe these systems are being used to target me. Security and maintenance staff are ordered to track my movements. This creates an atmosphere of surveillance and retaliation.

5. I am genuinely fearful for my life and safety. The threats, surveillance, and hostile emails create a dangerous 'call to arms' environment. I am afraid that someone may attempt to harm me or my animals. I respectfully ask the Court to take these fears seriously.

6. During my deposition, attorney Anthony D. Dwyer verbally intimidated my former attorney Richard

Rosenthal by stating: 'You have nerve to object when you havent even submitted any discovery to us.' Interrogatories submitted by Dwyer and co-defendants exceeded Rule 33(a)(1)'s limit of 25 and appeared intended to overwhelm me, a disabled pro se litigant. He also filed a motion to dismiss before the Court ruled on my Motion to Proceed Pro Se, exploiting my unrepresented status.

7. In November 2024, I called DPIE due to a complete lack of heat and the risk of carbon monoxide poisoning. A female inspector scheduled the inspection, but a male inspector I recognized from a prior incident arrived first. Two years earlier, this same inspector insisted on entering my unit during a complaint about HVAC outages. I now believe his presence was not to address HVAC issues, but to support an effort to remove me from the unit. According to McLaurins deposition, this inspector was instructed to attend by his supervisor. I question who instructed the supervisor and for what purpose.

8. Any damage alleged in my former unit was due to landlord neglect. I could not confirm the breed, odor, or whether any damage was associated with my service dogs. This is supported by McLaurins deposition testimony, which found no such damage and confirmed the inspection was not prompted by me.

I respectfully ask this Court to grant the relief requested in my Emergency Motion for Temporary Restraining Order and to enjoin the defendants from further retaliation, surveillance, and harm.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 11, 2025.

A handwritten signature in black ink, appearing to be 'Lester Aubrey Lee, Jr.', written over a horizontal line.

Lester Aubrey Lee, Jr.

Plaintiff Pro Se